

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

In re:

Case No. 6:12-bk-01772-KSJ  
Chapter 11

FAITH BIBLE MINISTRY OF TRINITY  
TRIUNE TABERNACLE INC.

Debtor.

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**MOTION BY DAVID E. BATEMAN AND BRENDA S. BATEMAN  
FOR AN ORDER DETERMINING THAT THE CASE  
IS A SINGLE ASSET REAL ESTATE CASE**

Creditors, DAVID E. BATEMAN and BRENDA S. BATEMAN (collectively, "Batemen"), by and through their undersigned attorneys, hereby move for the entry of an order determining that this case is a single asset real estate case as defined by 11 U.S.C. § 101(51B) and therefore subject to each one of the single asset real estate provisions of the United States Bankruptcy Code. The grounds upon which this Motion is based are as follows:

1. FAITH BIBLE MINISTRY OF TRINITY TRIUNE TABERNACLE INC. (the "Debtor") filed a Voluntary Petition under Chapter 11 of the United States Bankruptcy Code on February 13, 2012 (Docket Entry No. 1).
2. The term "single asset real estate" means "real property constituting a single property or project, other than residential real property with fewer than 4 residential units, which generates substantially all of the gross income of a debtor who is not a family farmer and on which no substantial business is being conducted by a debtor other than the business of operating the real property and activities incidental." 11 U.S.C. § 101(51B)
3. In this instance, the Debtor derives all, or substantially all, of its gross income from

the property located at 1011 S. Sanford Ave., Sanford, FL 32771 (the "Property"), which is operated as a place of worship, and is more particularly described as:

**Lot 6 and the East 11 feet of vacated street on West, Block 13, Tier A, Town of Sanford, according to the map or plat thereof, as recorded in Plat Book 1, Pages 56, of the Public Records of Seminole County, Florida.**

**and**

**Lot 10 and the East 11 feet of vacated street on West, Block 12, Tier A, Town of Sanford, according to the map or plat thereof, as recorded in Plat Book 1, Pages 56, of the Public Records of Seminole County, Florida.**

4. As reflected by the Amended Statement of Financial Affairs (Docket Entry No. 22), the Property appears to generate substantially all of the gross income of the Debtor.

Based on the foregoing, Bateman requests the entry of an order determining that this is a single asset real estate case, and that all of the single asset real estate provisions of the United States Bankruptcy Code, including but not limited to section 362(d)(3), govern this case.

Respectfully submitted,

/s/ Ryan E. Davis

Ryan E. Davis, Esquire  
Florida Bar No. 0179851  
rdavis@whww.com

**WINDERWEEDLE, HAINES, WARD  
& WOODMAN, P.A.**

Post Office Box 1391  
Orlando, FL 32802-1391  
Phone: (407) 423-4246; Facsimile: (407) 423-7014  
Attorneys for Bateman

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 6th day of March, 2012, a true and correct copy of the foregoing has been furnished via Electronic Transmission and/or via United States First Class mail to:

Jaimon H. Perry, Esq., The Perry Law Group, LLC, 538 East Washington Street, Orlando, FL 32801;

Miriam G Suarez, United States Trustee, 135 West Central Blvd., Suite 620, Orlando, FL 32801;

U.S. Trustee, 135 W. Central Blvd., Suite 620, Orlando, FL 32801;

Faith Bible Ministry of Trinity Triune Tabernacle Inc., 1011 S. Sanford Ave., Sanford, FL 32771;  
and

All Creditors and Parties of Interest, pursuant to Local Rule 1007-2, listed on the mailing matrix attached hereto.

*/s/ Ryan E. Davis*

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Ryan E. Davis

Label Matrix for local noticing  
113A-6  
Case 6:12-bk-01772-KSJ  
Middle District of Florida  
Orlando  
Tue Mar 6 09:52:44 EST 2012

City of Sanford  
300 North Park Ave  
Sanford, FL 32771-7899

End of Label Matrix	
Mailable recipients	1
Bypassed recipients	0
Total	1